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VIA ECFS

Marlene Dortch
445 12th Street, SW
Room TW-A325
Washington, DC 20554

RE: Comments of Meredith Corporation
RM-11848 / CG Docket No. 05-231

Dear Madam Secretary,

Meredith Corporation, owner of seventeen local television stations and Dynamic Captioning, LLC, respectfully **opposes** the petition filed in the above-referenced docket. *Petition for Declaratory Ruling and/or Rulemaking*, Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI) *et al.*, CG Docket No. 05-231, RM-8503 (July 31, 2019) (“Petition”). Specifically, Meredith believes that the Petition is not yet ripe, the proposed punitive regime ignores human elements of captioning, and that the Commission’s limited resources would be better used elsewhere. As both a television broadcaster and a provider of captions, Meredith has a unique perspective in this proceeding.

First, as the Petition makes clear, even if possible down the road (which is still uncertain), no accepted quantitative metrics are available today for the Commission to commence a rulemaking upon. Indeed, the Petitioners concede that the task of creating such metrics “has not become substantially simpler” since 1997.¹ While certain parties are attempting research to create quantitative metrics;² the results of that research will not be available for several years and what that research may or may not find is still speculative. Meredith looks forward to continued dialogue with researchers and has great interest in the research findings as they come out, but now is not the time for a Commission rulemaking on the topic.

Second, captioning - whether real-time, electronic newsroom technique, or even automated speech recognition - is a human creation and has human fallacies. Humans may make

¹ Petition at 15.

² [Disability and Rehabilitation Research Project on Twenty-First Century Captioning Technology, Metrics and Usability](#) (Captioning DRRP) (last visited Sep. 23, 2019).

a typo on a stenographic keyboard, in a script loaded just before the five p.m. newscast, or in a software dictionary. Typos happen. Moving from a best practices approach to a punitive, “Big Brother” monitoring and enforcement mechanism as proposed by the Petitioners will discourage - not encourage - the creation of important accessible content.

The Commission’s captioning enforcement ladder is working. As NAB’s research has shown, complaints to the Commission regarding captioning have decreased. In the face of those numbers, the results of the informal survey that the Petition relies upon are far from certain, and the survey itself falls well short of the Administrative Procedures Act and other federal data integrity laws. In any event, Meredith’s stations and Dynamic’s clients take all their viewers seriously and work tirelessly to serve all of them. A federal government agency monitoring their content for a “gotcha” moment will chill that speech and enthusiasm.

Third, given that the Petition is not yet ripe and that television stations have every incentive to keep their viewers happy, the Commission’s limited resources would be better spent on outreach and education to both broadcasters and the public. Meredith’s stations and Dynamic Captioning stand ready to help engage and educate.

Very Truly Yours,

A handwritten signature in black ink, appearing to read 'JPila', with a stylized flourish at the end.

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